

13-0515TJS

**AFFIDAVIT IN SUPPORT OF APPLICATION
FOR A SEARCH WARRANT FOR 8 U.S. MAIL PARCELS**

JUN 24 2013

I. Subject Parcels.

AT BALTIMORE
CLARK U.S. DISTRICT COURT
DISTRICT OF MARYLAND
BY DEPUTY

This is an Affidavit submitted in support of an Application for a Search Warrant for 8 subject U.S. Mail Parcels, hereinafter "Subject Parcels," or "SP." These Subject Parcels are currently located at the Incoming Mail Facility, in Linthicum Heights, Maryland. Those subject parcels are specifically identified as follows:

<i>Subject Parcel</i>	<i>Express (E) or Priority (P) and Tracking ID number</i>	<i>From: Name and Address</i>	<i>To: Name and Address</i>
1	(E) EI815566709US	William Stephenson 2708 Buckminster Dr Elk Grove, CA 95758	Isaac Brown 1700 East Cold Spring Ln Baltimore, MD 21251 Marble Hall Gardens Morgan State University
2	(E) EG73683024US	Kevin Williams 3032 E. Friess Dr. Phx AZ 85032	Sean Williams 7214 Campfield Rd. Gwynn Oak, MD 21207
3	(E) EI843819576US	Mike Riley 110 Cedar Rd North Amityville, NY 11701	Guopathon Fast MVA Suite 316 9801 Greenbelt Rd Lanham, MD 20706
4	(E) EI585634447US	A. Knittel 3009 Old Rodgers Bristol, PA 19007	A. Knittel 22101 St. Leonard Crl Great Mills, MD 20634
5	(E) EI647758404US	Kristina Maury 5850 Ocean Terrace Dr PPV, CA 90272	Lara DiPaola 901 Merriweather Way Severn, MD 21144
6	(E) EI973716811US	Jason Burke 810 Wooden Shoe Ln Manhattan, MT 59741	Justin Glenn 4021 Lomar Drive Mt. Airy, MD 21771

7	(P) 9505 5102 7983 3054 5045 39	Pamela Ellis 11142 N. 165 th Drive Surprise, AZ 85388	Tonya Savage 4007 Wabash Ave Apt 1B Baltimore, MD 21215
8	(P) No tracking number	Pamela Ellis 11142 N. 165 th Drive Surprise, AZ 85388	Tonya Savage 4007 Wabash Ave Apt 1B Baltimore, MD 21215

II. Affiant.

Your Affiant, Craig Jones, being duly sworn, hereby deposes and says:

A. Training and Experience: Your Affiant, Craig Jones, is a Postal Inspector with the United States Postal Inspection Service (USPIS) and has been so employed since August of 2001. Upon entering the United States Postal Inspection Service your Affiant completed twelve weeks of training in Potomac, Maryland. The training covered various aspects of federal law enforcement including the investigation of narcotics related offenses. Your Affiant has received an additional five weeks of training in dangerous mail investigations, including detecting and investigating suspicious mail pieces containing unknown powders, liquids, and explosives. Your Affiant has received additional training specifically in conducting narcotics investigations. Your Affiant has received instruction on conducting investigations of, and has, in fact, participated in investigations involving possession with intent to distribute and distribution of controlled substances. Your Affiant has participated in multiple interdictions, controlled deliveries, seizures and search warrants which have resulted in criminal arrests and prosecutions.

B. Basis of Knowledge: The facts and information contained in this affidavit are based on my personal knowledge as well as that of the other agents involved in this investigation. All observations that were not made personally by this affiant were related to him by the persons who made the observations. Sources of information used routinely in this process also includes:

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Verifying zip codes through a public database maintained by the U.S. Postal Service, *USPS.com*; and, Checking associations between names and addresses in a law enforcement database, *Accurint*. This affidavit contains only that information necessary to establish probable cause in support of an application for a search for each of these parcels. This affidavit is not intended to include each and every fact and matter observed by or made known to agents of the government.

C. Your Affiant's Findings: Based upon my training and experience in the field of narcotic interdiction through the mails, I know that there are suspicious characteristics common to many packages that contain narcotics and controlled substances. These factors, more fully detailed below, are used as a pointer system to identify packages requiring further investigation. It is the totality of the characteristics that create reasonable suspicion prior to presenting a parcel to a canine for examination. For the sake of these warrants, each parcel presented with several of these factors, and was also alerted to by the canine. While there are many characteristics that experienced inspectors look for, the most common factors or suspicious characteristics routinely observed in the course of screening packages are as follows:

1. Contrasts observed between legitimate business parcels and drug parcels:

a. Express Mail: As an alternative to First Class Mail which does not provide the ability of a customer to track the progress of a parcel through the system, the U.S. Postal Service offers Express Mail and Priority Mail. Express Mail is guaranteed (money back) to be delivered on a set date and time, usually overnight. (That deadline is determined at the time of mailing.) The customer receives a receipt with this guaranteed information, and the sender can opt for a signature requirement at the other end or not. Customers can track the parcel on line by its distinct Express Mail tracking number. The weight of the package and the distance traveled are the two main factors in setting the price. Express Mail costs more than Priority Mail.

b. Priority Mail: Priority Mail has a delivery service standard of 2-4 business days, but is not guaranteed. Priority is a less expensive alternative to Express, but still provides the ability to track a parcel.

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Businesses using Express Mail typically have a business or corporate account visible on the mailing label, which covers the cost of the mailing, in contrast to the drug distributor who will pay at the counter with cash or a credit card. Business Express Mail parcels typically weigh no more than 8 ounces, and business Priority Mail parcels typically weigh no more than 2 pounds. Drug packages typically exceed these weights. Address labels on business parcels are typically typed, and drug packages are typically hand written. In your affiant's experience, it is fairly easy to separate out smaller parcels, which constitute 70 to 80% of all Express and Priority Mail parcels, from other parcels. Typically, drug traffickers using Express mail, will opt out of the signature requirement.

2. Invalid Sender/Return Address: When drugs are shipped through the mails, the senders generally do not want them back. To distance themselves from parcels containing drugs, often the return addresses and the names of senders are fictitious or false. A fictitious or false address is anything from an incorrect zip code, to a non-existent house number or street. The name of the sender is also typically invalid in one of several ways. Your affiant has seen packages sent by person with names of celebrities, cartoon characters, or fictional persona. More often a search of the *Accurint* database reflects that there is no association between the name of the sender, and the address provided.

3. Invalid Recipient/Address: It would be counter-productive to put the wrong receiving address on a package, but often the named recipient is not associated with the address. This provides plausible deniability to anyone receiving the package as to their knowledge of its contents. Sometimes drug packages are addressed to vacant properties with the expectation that the postal carrier will just leave it at the address. The intended recipient will then retrieve it from that location and will hope to remain anonymous.

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4. Your affiant knows that packages from California, New York, and Arizona, from where these Subject Parcels have been sent, if other criteria are present, can also indicate a parcel containing controlled substances.

5. Additional factors seen less frequently, but nevertheless noteworthy include:

a. Smell: The odor of cocaine, marijuana, and methamphetamine are distinct, and through experience postal inspectors are familiar with these odors. On occasion, a parcel will emit an odor that is easily recognized without the assistance of a canine. (Again, this is only a pointer.) Other smells that suggest the contents are drugs, are from masking agents. Common masking agents used in an attempt to thwart law enforcement and canines typically include dryer sheets, coffee, mustard, and any other substance that releases a strong smell.

b. Heavily taped parcels are another factor that will suggest a drug parcel.

Your affiant has also observed excessive glue on the flaps as well.

It is your affiant's experience that when these factors are observed, a canine hit will follow. As a result, these factors become a reliable way to profile the parcels being shipped every day.

III. Statement of Facts and Circumstances.

The following factors or suspicious characteristics are present in each of the subject parcels:

Subject Parcel (E/P)	Weight	FROM Invalid? name/address	Other?
From Source Area ?	Label	TO/Invalid? name/address	Canine Alert?

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1 – Express	1 lbs 11 oz	Name not associated	Excessive tape
Yes – CA	Handwritten	All okay	Yes - Arco ¹
2 – Express	2 lbs 7.7 oz	Name not associated	Vacant house
Yes – CA	Handwritten	Name not associated	Yes - Cyrus ²
3 - Express	0 lbs 8.5 oz	Name not associated	Smell
Yes – NY	Handwritten	Name not associated	Yes - Cyrus
4 – Express	0 lbs 1.5 oz	Name not associated	Smell
No – PA	Handwritten	All okay	Yes - Cyrus
5 – Express	2 lbs 3.1 oz	All okay	Smell
Yes – CA	Handwritten	All okay	Yes - Cyrus
6 – Express	0 lbs 5.9 oz	Name not associated	Smell
No – MT	Handwritten	All okay	Yes – Yes
7 – Priority	16 lbs 5.3 oz	Name not associated	
Yes – AZ	Handwritten	Name not associated	Yes – Cyrus
8 – Priority	20 lbs 3.3 oz	Name not associated	Excessive tape
Yes – AZ	Handwritten	Name not associated	Yes - Cyrus

Standard protocols for canine detection are followed. Specifically, on this date, your Affiant placed the subject parcel identified herein, in an office among other boxes at the Incoming Mail Facility, Linthicum Heights, Maryland. At that time, the law enforcement dog handler identified herein, with his narcotic detecting canine, identified herein, were brought in to search the office. The handler observed the canine and then informed your Affiant that the dog alerted on the

¹ “Arco” was last certified in January of 2013 to alert on odors of ecstasy (MDMA), cocaine, heroin, and marijuana (THC) and is trained on a monthly basis to ensure his accuracy. Howard County Police PFC. Joe Gummo is the handler for “Arco.”

² “Cyrus” was last certified in March of 2012 to alert on odors of ecstasy (MDMA), cocaine, heroin, and marijuana (THC) and is trained on a monthly basis to ensure his accuracy.

13-0515TJS**ATTACHMENT A****DESCRIPTION OF PARCELS TO BE SEARCHED**

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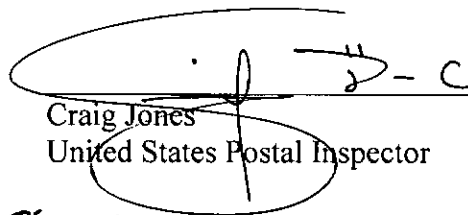
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subject parcel which was hidden among other boxes. Your Affiant also observed the canine alert on the parcel in each instance.

VI. Conclusion.

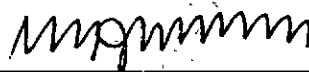
Your affiant submits that based upon the above indicators reflected in the 8 Subject Parcels described herein, based upon my training and experience, and based upon the alert of a trained canine on each package, I believe there is probable cause that each of the above-described subject parcels contain narcotics or controlled substances and/or materials relating to the distribution of controlled substances through the United States Mail.

Respectfully submitted,



Craig Jones
United States Postal Inspector

TS 15m
Subscribed and sworn to before me this 14th day of March, 2013.



Timothy Sullivan
United States Magistrate Judge
District of Maryland

Anne Arundel County Police Detective Yancey Quigley is the handler for "Cyrus."